

DAVIS WRIGHT TREMAINE LLP

1 THOMAS R. BURKE (CA State Bar No. 141930)
DAVIS WRIGHT TREMAINE LLP
2 505 Montgomery Street, Suite 800
San Francisco, CA 94111
3 Telephone:(415) 276-6500
Facsimile: (415) 276-6599
4 Email: thomasburke@dwt.com

5 LAURA HANDMAN (appearing *pro hac vice*)
LISA ZYCHERMAN (appearing *pro hac vice*)
DAVIS WRIGHT TREMAINE LLP
6 1301 K Street NW, Suite 500 East
Washington, DC 20006
7 Telephone:(202) 973-4200
Facsimile: (202) 973-4499
8 Email: laurahandman@dwt.com
lisazycherman@dwt.com

9 LACY H. KOONCE, III (appearing *pro hac vice*)
10 DAVIS WRIGHT TREMAINE LLP
1251 Avenue of the Americas, 21st Floor
11 New York, NY 10020
Telephone: (212) 489-8230
12 Facsimile: (212) 489-8340
Email: lancekoonce@dwt.com

13 Attorneys for Defendants
14 GREENPEACE INTERNATIONAL (aka "GREENPEACE STICHTING
COUNCIL"), GREENPEACE, INC., DANIEL BRINDIS, AMY MOAS, and
15 ROLF SKAR

16 LEO J. PRESIADO (State Bar No. 166721)
BROWN RUDNICK LLP
17 2211 Michaelson Drive, 7th Floor
Irvine, CA 92612
18 Telephone: (949) 752-7100
Facsimile: (949) 252-1514
19 Email: lpresiado@brownrudnick.com

20 MICHAEL J. BOWE (admitted *pro hac vice*)
21 LAUREN TABAKSBLAT (admitted *pro hac vice*)
BROWN RUDNICK LLP
22 7 Times Square
New York, New York 10036
23 Telephone: (212) 209-4800
Facsimile: (212) 209-4801
24 Email: mbowe@brownrudnick.com
ltabaksblat@brownrudnick.com

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26 Attorneys for Plaintiffs
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IN THE UNITED STATES DISTRICT COURT

THE NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

RESOLUTE FOREST PRODUCTS, INC.,
RESOLUTE FP US, INC., RESOLUTE FP
AUGUSTA, LLC, FIBREK GENERAL
PARTNERSHIP, FIBREK U.S., INC., FIBREK
INTERNATIONAL INC., and RESOLUTE FP
CANADA, INC.,

Plaintiffs,

v.

GREENPEACE INTERNATIONAL (aka
“GREENPEACE STICHTING COUNCIL”).
GREENPEACE, INC., GREENPEACE FUND,
INC., FORESTETHICS, DANIEL BRINDIS,
AMY MOAS, MATTHEW DAGGETT, ROLF
SKAR, TODD PAGLIA, and JOHN AND JANE
DOES 1 through 20, inclusive,

Defendants.

Case No. 4:17-cv-02824-JST (KAW)

**JOINT SUBMISSION OF LETTERS OF
REQUEST TO QUEBEC MINISTRY OF
FORESTS, WILDLIFE AND PARKS**

Complaint Filed: May 31, 2016

Amended Complaint Filed: November 8, 2017

DAVIS WRIGHT TREMAINE LLP

Pursuant to the Order of Magistrate Judge Kandis A. Westmore entered September 16, 2020 (ECF No. 340) (the “Order”), Defendants Greenpeace International, Greenpeace, Inc., Daniel Brindis, Amy Moas, and Rolf Skar (collectively the “Greenpeace Defendants”), and Plaintiffs Resolute Forest Products, Inc., Resolute FP US, Inc., Resolute FP Augusta, LLC, Fibrek General Partnership, Fibrek U.S., Inc., Fibrek International, Inc., and Resolute FP Canada, Inc. (collectively “Resolute” or “Plaintiffs”), by and through their respective counsel, hereby jointly submit the attached proposed order to issue the letters of request to the Quebec Ministry of Forests, Wildlife and Parks (the “Letters of Request”). The parties attest that they have complied with Section 9 of the Northern District’s Guidelines for Professional Conduct, and that, as required by this Court’s Order (ECF No. 340), counsel for Plaintiffs and for Greenpeace Defendants met and conferred telephonically regarding the Letters of Request on February 5, 2021. Plaintiffs do not object to the Letters of Request but do not endorse the Defendants’ content or characterizations found therein as true.

This 8th day of February, 2021.

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By:

/s/ Lacy H. Koonce, III

Lacy H. Koonce, III

Attorneys for Defendants
GREENPEACE INTERNATIONAL
(aka "GREENPEACE STICHTING
COUNCIL"), GREENPEACE, INC.,
DANIEL BRINDIS, AMY MOAS, and
ROLF SKAR

BROWN RUDNICK LLP

By:

/s/ Lauren Tabaksblat

Lauren Tabaksblat

Attorneys for Plaintiffs

DAVIS WRIGHT TREMAINE LLP

[PROPOSED] ORDER

This Court, having considered all of the evidence and submissions in connection with the Defendants' request for the issuance of Letters of Request to the Ministry of Forests, Wildlife and Parks, and for good cause appearing, hereby rules as follows:

IT IS ORDERED that the request to issue the Letters of Request to the Ministry of Forests, Wildlife and Parks annexed hereto as Exhibit A, is GRANTED.

IT IS SO ORDERED.

Dated:

The Honorable Kandis A. Westmore

DAVIS WRIGHT TREMAINE LLP